

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division

IRA D. SOCOL,

*Plaintiff,*

v.

ALBEMARLE COUNTY

SCHOOL BOARD, *et al.*

*Defendants.*

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Case No.: 3:18cv00090

**MOTION FOR ENTRY OF PROPOSED PROTECTIVE ORDER**

Defendant Matthew Haas, by counsel, with the consent of the plaintiff and the third-party witness, Pamela Moran, as evidenced by the signature of their respective counsel on the attached order, moves for the entry of the attached proposed protective order.

WHEREFORE, Defendant Matthew Haas, by counsel, requests that the attached proposed Protective Order be entered and for such other and further relief as the nature of this case requires.

Respectfully submitted,

/s/ Jennifer D. Royer  
Jennifer D. Royer, VSB # 68099  
ROYER LAW FIRM, P.C.  
Post Office Box 4525  
Roanoke, Virginia 24015  
540-788-2982 Telephone  
540-675-4093 Facsimile  
jroyer@royerlawfirm.com  
Counsel for defendant

CERTIFICATE

I hereby certify that on the 20th day of May, 2022, I have electronically filed this document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Jeffrey R. Adams, Esq.  
Lucas I. Pangle, Esq.  
Wharton, Aldhizer & Weaver, PLC  
125 S. Augusta Street  
Staunton, Virginia 24401

I have also caused an electronic copy of the foregoing to be sent to the following third-party, by counsel:

Marc A. Peritz, Esq.  
FLORA PETTIT  
530 East Main Street  
P.O. Box 2057  
Charlottesville, Virginia 22902  
[map@fplegal.com](mailto:map@fplegal.com)  
Counsel for Dr. Pamela Moran

/s/ Jennifer D. Royer  
Jennifer D. Royer, VSB # 68099  
ROYER LAW FIRM, P.C.  
Post Office Box 4525  
Roanoke, Virginia 24015  
540-788-2982 Telephone  
540-675-4093 Facsimile  
[jroyer@royerlawfirm.com](mailto:jroyer@royerlawfirm.com)  
Counsel for defendant